

# Riva Kastoryano

## Codes of Otherness

WHEN ARISTIDE ZOLBERG AND LONG LITT WOON EXPLAINED “WHY Islam is like Spanish,” they referred to two ways of designing otherness on both sides of the Atlantic: religion in Europe and language in the United States.<sup>1</sup> The authors justify these two othernesses in that “the passions awakened by the Rushdie affair in the United Kingdom and the headscarf affair in France denote a simmering confrontation between ‘Christian’ Europe and ‘intruding’ Islam.” In the United States, they argue that “the referendum on bilingual education in California (June 1998) points to an equally dramatic clash between ‘Anglo America’ and ‘invading’ Spanish language” (Zolberg and Woon 1999: 27).

The Other has been at the core of questions raised by the social sciences in general. For Simmel, the Other, “is the Stranger who is beyond being far and near. The *Stranger* is an element of the group itself, not unlike the poor and sundry ‘inner enemy’—an element whose membership within the group involves both being outside it and confronting it” (Simmel 1971 [1908]: 144). Interactions within and without groups follow codes, categories, and boundaries to identify the included, the excluded, the conformist, and the deviants as *Outsiders*, according to Howard Becker, with regard to their disobedience of juridical and political norms or to social and cultural codes (Becker 1963).

Defining the Other requires drawing real or symbolic boundaries (Lamont and Fournier 1992). Boundaries lead to internal differentiation creating social, cultural, and moral categories; they generate hierarchies among cultures; in short they engender complex relations where each element constitutes a microsociological basis. As reminded by Baudrillard in reference to Chris Marker, “otherness is crossing a

boundary, and a boundary can be totally imaginary and invisible” (Baudrillard and Guillaume 1994: 50). As far as territorial boundaries are concerned they designate the political unity of nations, the boundaries of an “us” of which the content is nourished by a national rhetoric and historical experiences. The passage from cultural boundaries to political boundaries is realized through the institutionalization of sameness and difference, a process through which identities—religious, linguistic, racial—are elaborated.

The European social sciences inspired by Durkheim—in *The Social Division of Labor*—and Weber—with regard to the concept of *status group*—have classifications as social-professional categories formalized by institutions. Since the application of “identity politics,” liberal democracies have introduced differences in cultural terms—such as religion or language in order to formalize otherness without necessarily institutionalizing them. Thus, an essentialism that freezes differences into categories meets the strategies of the groups and their objective to have differences be recognized and institutionalized.

Identity boundaries drawn by spontaneous relations or institutionalized in formal categories, as in the census for example, or constructed by discourses or asserted by politics, find an echo in what Charles Taylor has called the “politics of recognition” as a “democratic defense of cultural diversity within a universalistic perspective” (Taylor 1992). Opposed to a politics of assimilation of the Other into the same, politics of recognition, despite its objective to reduce inequalities, contributes to the construction of boundaries, to a separation between the same and the Other. The politics of recognition implies the identification of the Other and its inscription into a cultural, social, economic, and juridical account (Fraser 1995; Caillé 2004: 23). Recognition of Otherness comes along with specific rights in the public domain of fundamental rights. At stake is the principle of justice and equal citizenship. Public recognition of identities reinforces the inventive character of identities, an awareness of belonging to a specific group that asserts its difference with regard to its cultural, social, and economic environment. It imposes also the adoption of new features of identity that

seem relevant and legitimate in a minority situation—variously linked to immigration and regional, linguistic, and ethnic membership. Thus language, nationality, religion—all these fragments of identity, sometimes intermingled, sometimes separated by artificial or circumstantial boundaries—come out as the core of a collective identity imagined as real or mythical past or appear through social relations as markers of situational boundaries.

Despite political and theoretical justifications of recognition, differences that are asserted, claimed, and legitimated are sources of paradox. They underline a coexistence of differences as the rule of functioning in the city; they produce at the same time a competition for resources and turn politics into a battleground that privileges cultures and identity in which their differences lead to the exclusion of the Other from the self-representation of the state and the nation. Defining the Other comes to attribute a different status—juridical, cultural, and social—than the majority. Politicized identities transform all differences in search of recognition into the Other. At stake is a differentiated identification to the political community that challenges its common civic understandings. The normative questions related to this controversy include the definition of a common political space for participation, the definition of a common good, as the foundation of justice and universality.

Thus, the question is complex, the answers multiple, normative, and interpretative. Different approaches appear in the definition of Otherness. The first is interactive; that is, the interaction between states and groups in search of political recognition. Through interactions one can measure the dynamics and the mechanisms of boundary construction and justify its legitimacy (Kastoryano 2002). The second approach is normative. It is based on justice and equality as means of recognition. And the third approach is political. It is based both on empirical reality and normative perception and leads to institutional adjustments. All the three approaches come to show how explicitly or implicitly identity is perceived as “permanent difference,” as the main source of cleavage in one society. Can language be considered as “a permanent

difference,” like religion, with the same understanding of institutional recognition and legitimacy? This article tries to explore the elaboration of differences through the use of concepts of categories and policies with regard to the Other in France, Germany, and the United States.

## CONCEPTS

Each society has its Otherness. France and the United States—two republics born of two different historical contexts—are, today, going through the same tensions between universalism and particularism but practice very different modes of inclusion and exclusion. According to George Fredrickson, respective histories show many similarities in the facts but also many contrasts in their reactions. Both states practiced slavery, abolished in 1848 in France and during the Civil War in the United States; but slavery according to Fredrickson has constituted the central element of the American national experience (Fredrickson 2005). Both republics have established citizenship at the foundation of the theory and institutional practice of nationhood. But both developed different approaches to immigration.

France discovers itself retrospectively as “a country of immigration,” but according to Gérard Noiriel, immigration is not as constitutive of the French nation as it is of the American nation (Noiriel 1987). Even so, a differentiated treatment has been applied according to the nationality—that is, to race—in the United States. In 1882, for example, the “Chinese Exclusion Act suspended immigration of Chinese labor for 10 years. It was extended in 1892, and made permanent in 1902 as a law, making Chinese ineligible for naturalization” (Schain 2004: 184). This restrictionist law limits immigration and naturalization according to ethnoracial categories introduced with the first law of naturalization of immigrants adopted in 1790 in which citizenship was reserved to “free individuals and white.” Aristide Zolberg refers, in *A Nation by Design*, to the essay of Franklin in 1751 that the limits of inclusiveness were to be drawn on the basis of race (Zolberg 2006: 56). Religion, on the other hand, has been developed in a pluralist framework in the United States, even though the presumptive dominance of Protestantism and

the persistence of anti-Catholic prejudice with regard to immigrants from Ireland pervaded much of the nineteenth century.

Recent studies of the United States show the switch of boundaries in the perception of Otherness from race to ethnicity or to diversity. Even, as reminds Kenneth Prewitt in this volume, “race is a bounded and durable trait,” he also emphasizes that “diversity, with its multiple proliferating and overlapping categories complicates the protocols that surround America’s effort to apply its racial classification in pursuing social justice policies” (Prewitt 2010). Huntington, in his last book, *Who Are We?*, insists on language as a main boundary between the newcomers—Hispanics—and the American nation and criticizes the fact that the ones targeted as the Other share the same language, thereby endangering Anglo-Saxon conformity that has been defined as assimilation in America. Even though his views are not representative of the majority of studies on immigration and ethnic groups, they nevertheless mark a shift in the definition of the Other in terms of language (Spanish) and religion (Catholic) as differences to add to the racial one (Huntington 2004). In a more historical, Richard Alba (again in this issue) asserts that there were bases other than race for boundaries among white groups defined by different religions and European points of origin “with reference to Eastern European Jews and Catholics along with the Irish Catholics” (Alba 2010).

Thus, concepts represent the Other by attributing a religious or racial identity. They arise as a justification of the political project and historical experiences of the nation. French political and sociological traditions have long resisted the concepts of race and ethnicity. This resistance was justified by the Republican ideal of public life. This ideal is embodied in the preamble to the French constitution of October 27, 1946, which specifies that “France forms with its overseas peoples a Union based on equality of rights and duties, without distinction of race and religion.” The 1946 preamble became Article 2 of the constitution of the Fifth Republic of 1958. According to it, “France is an indivisible, secular (*laïc*), democratic and social Republic. It assures all its citizens equality before the law without distinction of origin, race and

religion. It respects all beliefs.” Consequently, both concepts are somewhat obscure in intellectual, social, and political discourses.

The French political tradition has resisted for a long time the use of the terms race and ethnicity, a resistance explained and justified by Republican ideology. However, the concept of race has been used historically in France in varied ways, although it still remains ambiguous. Theorists have debated questions of racial difference for centuries ranging from the “objectivity” of racial inequality to the existence of cultural hierarchies (Todorov 1998). The lack of clarity is due partly to the fact that “race” was often used interchangeably with “nation” in the nineteenth century. Todorov’s study of “human diversity” in French thought shows that some interpretations made blood and color the key to race—the most famous example is Gobineau’s *Inequality of Races*—while other authors like Renan made membership in a linguistic group the main criterion, and Taine spoke of a historical race. Colonialism preoccupied all of these early writers. It provided the basis for a juridical categorization of “race,” mainly in terms of skin color: “black and white.” This translated into social science terminology as categories of belonging. “Race” or “ethnicity” were also superimposed on linguistic communities as political, sociological, and demographic classifications in colonial Algeria. Ethnicity designated “local” populations and their “ethnic” communities were also classified by regional characteristics, language, and customs.

Within the “Metropole” a “confessional category” was established for the “Jewish race” in the Vichy years (1939–1942). The Vichy experience generated a strong reaction against the use of the term “race” in political and social terminology as well as in social science. Postwar Republican France, returning in part to the eighteenth- and nineteenth-century tradition, focused instead on the ideal of citizenship. The preamble to the constitution of 1946 was in the aftermath of Vichy and at a time when colonialism was being contested. The constitution was conceived therefore in opposition to any type of inequality imposed on people because of “race” or “origin” or “religion.” The term “Union” defines France as inclusive of its colonies. The goal, at least in

part, was to correct determinist approaches that classified races according to physical, moral, and cultural criteria and used those distinctions to establish relationships of superiority and inferiority among populations (Kastoryano 2004).

Since the 1980s, passionate debates in France have introduced the concepts of ethnicity, minority, and community into the political vocabulary in order to describe a convergence of the sociopolitical reality with the United States with regard to the settlement of the postcolonial immigrants in France today. Issues of citizenship and collective identity have become contentious matters, especially when it comes to religion and claims for its recognition. Claims for the recognition of Islam designate the same historical phenomenon while representing to different Othernesses: the “Muslim” in France and an ethnic group in the United States (Green 2002: 61). Jennifer Hirschchild shows, however, that the idea and the term “ethnicity” in the United States did not exist at the beginning of the century. It was invented after the World War I; instead, the word “race” was used. She argues that a century later race still refers to ethnic groups in American social sciences, and ethnicity has been invented as a reaction to race (Hochschild 2005; Hattam 2004).

Neither in France nor in the United States has religion been an official category. Nevertheless, in the United States, several studies on new immigrant groups indicate that religion has been a basis for shaping their communities in their new land. Often divided by nationality, churches comprised the center of efforts to maintain and transmit the values of the old country. Charles Hirschmann claims that, historically, “immigrants become Americans by joining a church and participating in its religious and community life” (Hirschman 2004). Peter Schuck shows that, historically, “religious identities have played important, often decisive roles in orienting them to American civil society, effecting their integration into it, and eventually incorporating them into the polity” (Schuck 2003). In France, historical studies have pointed out that the “cult of assimilation,” as the basis of national unity, produced in citizens an “indifference” to their separate linguistic or religious

affiliation, which became obscured or suppressed in private life—mainly for language and religion—once they passed through the “mill of institutions” (Noiriel 1987). The same was true in early twentieth-century Germany, where “Germanization” meant forced assimilation with reference not to religion but to language. Nevertheless, religion has been a source for racist inspiration against the Catholics in the United States and against the Jews in France with the Dreyfus Affair and Vichy. Today Muslims, postcolonial migrants, occupy the major place in European public debates. Those Muslims who have become citizens in the West are now mobilizing for the recognition and representation of Islam within national societies. This confrontation of a population that has a collective identification with Islam with established European secular political traditions is one that blurs the accepted boundaries between private and public. Islam as a way of “reappropriating” identity in politics makes religion the emergent ethnicity in Europe, challenging therefore the French *laïcité* (secularism) that has become the fundamental value of the Republic and French approach to pluralism.

## CATEGORIES

The imposition of race and ethnic categories in the American censuses has been modified by the introduction of the self-identification of “ethnic ancestry” in the 1980s. This change is related to identity politics and the valorization of ethnic, national, and racial diversity. The subjectivity expressed in this category underlines the blurred boundaries between nationality, ethnicity, and color and has been the foundation of the fight against racial discrimination.

In France, the official census classifies the entire population under three categories: French by birth, French by acquisition (naturalization), and foreign. Thus, once the foreigner is naturalized, he moves into the column of French by naturalization; his children born on French soil are declared French by birth. Unlike the American census since 1980, which has tried to highlight ethnic ancestry, in France the national and ethnic origin of citizens does not appear in official documents, and, consequently, has no legal or statistical validity. The Code



of Nationality sets up statistical categories that exclude questions of “origin” once French nationality is obtained (Silberman 1992: 112-123), leading to a statistical invisibility of any “ethnic ancestry.” In the census of 1990, however, a new category of “previous nationality” of naturalized French citizens was introduced into the presentation of statistics on foreigners, broken down by age, sex, work, type of household, etc. In the preface to the 1992 census, carried out by the National Institute for Statistics (INSEE), the foreign population is referred directly to changes in the laws of nationality that justify the clarification about the past and an awareness of belonging through generations—making the former nationality of the immigrant a permanent category, or making a former foreigner a permanent one. The census of 1999 made a distinction between “immigrant population” and “foreign population.” The “immigrant population” is classified by “country of birth.” Whether “immigrant population” refers to the previous nationality of a new citizen or to membership of a nation of those who have been established for several generations, to mention it suggests the persistence of an identity, an “immigrant identity,” separate from that of the majority. It relegates the individual to the country of birth and to the previous nationality, despite his or her actual citizenship, as a permanent marker and creates thereby an ambiguous “category” that is ethnicized and omitted from identification with “acquired” French nationality. The “previous nationality” or that of the parents for younger generations or even a “country of birth” was then expressed by demographers in terms of “origin” as a clarification about the past and an awareness of the conditions of belonging throughout generations.

Unlike the United States, in France a classification by origin or declared ancestors is excluded from the concept of national society and from census practice; yet initiatives are aimed at creating a category that is informal but that does affect self-definition of immigrants (that is, more precisely, North Africans). Is the classification of the population by generation, language use, ethnic ancestry, or foreign birth an acknowledgment of “origins” or is it a stigmatization of immigrants as “Other” because of their so-called origins? To acknowledge origins,

argues French demographer Patrick Simon, has become a scientific requirement. Simon says that the statistical invisibility of ethnic categories aids discrimination; whereas a reference to “origins” helps to define a social phenomenon as the reality of a multicultural society. Despite methodological problems concerning the sociological analysis of the immigrants (social mobility, level of education, marriage), the ignorance about how immigrants and their children and grandchildren are performing raises the problem of political action. In other words, Simon argues that “to acknowledge” makes “action” possible (1999: 111).

The scope of categories—explicit or implicit—comes out in the verbal war it produces. Words and concepts concerning immigration or the presence of immigrants are controversial, loaded with feeling, sometimes spawn conflicts, and sometimes contribute to them. Immigrants, foreigners, ghettos, ethnic groups, and communities—to be translated as Islam, Islamism, and fundamentalism—are terms and concepts that are used without regard for “the marks of their ancestral memory,” as Michel Foucault put it. In short, words, as agents of persuasion and influence create public opinion and justify political orientations. The escalation of “preconceptions,” in the Durkheimian sense, makes the subject a commonplace, “allegedly known,” in *journalèse*, where everyone has something to say. The vocabulary related to otherness ends in linguistic reflex, making difference a battleground of competition among parties in Europe.

Such discourses have a direct effect on the politics of “Otherness” and its use in the production and perpetuation of opinion and its echo in party competition. They contribute to the construction of the cultural and political repertoire of populist parties and the way they instrumentalize codes of difference. Otherness is not limited to one element of identity. It includes religion and culture according to party politics and has the capacity to adapt itself to the changing social reality nourished by street demonstrations that shape public opinion and political decisions. Framing the immigration issue in terms of identities and politicizing it affects not only extreme populist parties’ concerns; they create

an alignment, among parties. Ever since the National Front in France and the right in Germany (such as the Christian Democratic Union) built their campaigns on the “problem” of immigration, there has been a war of words. But in France, the use of those words goes beyond the bounds of the National Front and produces a common arena of discussion and confrontation between the opposition and the government. Each tries to attack or defend the government’s ability to control the borders, the territorial boundary of identity, and to defend national interests. Each tries to be more efficient in the expulsion of illegal immigrants, showing with reports that they can control borders and integrate a Muslim population.

Thus, discourses, actions, and politics give new dynamics to the definition of boundaries among groups and the codes of Otherness designated by politics torn between its own particularity and its pretension to universality.

## **POLITICS**

Beyond a simple terminology and their use for statistics, concepts and categories are obviously strategic tools for actors as well as for political decisions. At stake are the political outcomes of racial or ethnic classification: to stigmatize an identity or to reinforce antidiscrimination laws (Prewitt 2005). In the 1960s, in the United States, claims and the mobilization of minority groups led to an institutional visibility of racial difference along with political measures called affirmative action. Interpreted as positive discrimination, the politics of affirmative action were intended to compensate for past policies mainly with regard to slavery and racial segregations. In France the absence of statistical data for ethnic categories goes along with the absence of any targeted policies, at least in the official rhetoric (Simon 1999). In Europe, the question of “recognition” implies the extension of the welfare state to a new domain, the one of identity, with the definition of new social policies in order to guarantee the integration of postcolonial migrants. Although the French corporatist approach does not address identity issues, which were private, and considered the inclusion of immigrants’ integration

into the welfare state, it comes with a rhetoric that emphasizes merely the social aspect of integration; that is, social integration, in opposition to exclusion. Exclusion is not simply about being geographically peripheral. It also refers especially to social institutions and to the labor market, to educational failure, and to unemployment. To maintain the principle of universality, French governments—right or left—therefore deal with the issue of immigration or immigrants' integration (housing, education, job market) under a "social" exposure (Rosanvalon 1996). What is at stake is the "social bond" (*lien social*), a term inspired by a sociological and political tradition that refers to the idea of national solidarity, cohesion, and integration.

In discourse, the evil is primarily social and must be corrected by society. This logic reflects the political rhetoric of denying any "special treatment" of the foreign population or immigrant. In reality, however the social element is closely linked to the cultural—not named, although recognized as such through policies. The rule of a political intervention is "color blind," but its application targets specific areas and groups. For example, since 1982, suburbs with high concentrations of immigrants, particularly Muslims, are called "priority urban zones" (ZUP). They are recognized by the government as a source of unrest. Their schools are codified as "priority education zones" (ZEP)<sup>2</sup> (Boulot and Boyzon-Frader, 1987), which "from their preparation and development to their implementation emphasize concerns about foreign children and children of foreign origin in order to create educational and pedagogical possibilities" (Prévot 1991).

With the riots in French suburbs in 2005, France—the media, the political class, and intellectuals—has publicly questioned the "French model" based supposedly on Republican individualism, on the assimilation of individuals who have made a political choice to become citizens and thus French. The first public interpretations of the riots emphasized their communitarian character. Examples were drawn from Great Britain, which embraced multiculturalism considered as an "antimodel," like the "American model." Both were considered as countries that recognize communities expressing their cultural particulari-

ties expressed in public life, leading to the fragmentation of the society into several separate communities and ruining the political unity of the nation. The French media were triumphant when the Dutch, after the assassination of Theo Van Gogh, and the British, after the 7/11 terrorist attacks in London, questioned the effect of multiculturalist policies in their societies.

While the fight against discrimination and inequality continues in racial terms in the United States, it is an issue of recognition in France and has crystalized around the recognition of Islam. This can be seen in the mobilization of the national community around the headscarf controversy, which reinforced the immigrant population's identification with Islam and made religion a mobilizing force that has breathed substance into the formation of a community and created Islam as the main cleavage in French society, even though the politicians have rallied around the case of the headscarf in the name of *laïcité*, and have made religion a legitimate basis for identity and a legitimate basis for a community to recognize and therefore to institutionalize.

Its recognition on the same basis as other institutionalized religions in France has become fundamental for equal treatment of all religions. The creation of the French Council of Muslim Worship (CFCM) in 2003 as a representative institution of Islam by the state arose to ensure an Islam of France, to situate the second religion of the country on the same footing as other religions in France. The accommodation of politics after the effects of an applied multiculturalism led the French state to a sort of institutional assimilation of Islam, like other religions such as the Jewish Consistory (a Jewish religious representative institution created under Napoleon) and the Protestant Federation of France.

The search for an institutional representation of Islam leads to the perception of Islam as a marker of permanent difference in all European countries, an institutionalized Otherness. As if to assert historic continuity, the French state has taken refuge behind an "inclusionist" strategy and discourse that encourages representative institutions to make their chairman its collective spokesperson and to consider their members full partners in the political community. The

greatest change, however, is the explicit reference to religion and its representation leading to the recognition of an implicit “ethnicity” in France even if its recognition remains “taboo.”

While the political and normative issues remain those of justice and equality, the social issue has become the ethnicization of a “religious minority,” with Islam as the main identity element, thus cementing a “legitimate community.” Its institutionalization is, however, the result of mobilizations, nourished by public discussions generating an “awareness of belonging.” A simple consciousness of cultural differences has been transformed into political action with mobilizations to demand for the state recognition of those differences.

Obviously, if religion appears empirically as the main cleavage point, its recognition in France or Germany or any other European country with the settlement of postcolonial migration can be seen as the means for incorporating Muslims into the institutional setting of each country with regard to religion. The question is then: Does institutional justice compensate for social injustice? Can the demand for recognition be limited to official representation when other institutions, such as schools, are not fulfilling their function in integrating and promoting “civic values” as a basis for social, cultural, and religious equality? Can an institutional approach help to develop tools along with the acceptance of the “Other” in everyday life, which is possible only if mentalities follow the institutional changes?

In Germany, liberal laws on citizenship since 2000 seem to have added a new otherness: language. The boundary designating the Other on a nationality basis, that of the foreigner, the Turk before the acceleration of citizenship laws facilitating their naturalization, has switched also to religion, such as the “Turk with a German passport” and the Muslim with the same concerns of institutional representation. But, interestingly, with the increase in the rate of naturalization the knowledge of the German language has become the sign of integration of the foreigner and the important element of German identity to be respected and the requirement for access to citizenship (Tietze 2005). Since 2004, the German language has been officially established in the program

of integration policies and justified by its importance for access to the labor market as a basis of equal citizenship.

## **BEYOND BORDERS**

Whatever the discourse or the practice, whatever the definition of the Other, gradually all liberal democracies have converged on a sort of “applied multiculturalism.” Such uniformization of the debate does not erase boundaries but makes the existence of boundaries a universal issue even though the codes of Otherness vary from one context to another. The question remains: What are the cultures and groups entitled of recognition (Joppke 2004)? What group rights would be legitimate for recognition? Who are legitimate Others?

In Europe, critics of multiculturalism have emphasized the radicalization of the Other: the Muslim (Fukuyama 2006). Arguments are grounded in the effect of multiculturalism on the economic, cultural, and political isolation of communities—ethnic violence perceived as a result of identity politics that failed to ensure civic harmony (Bader 2005: 64; Koopmans 2005). Multiculturalism in Europe has then switched to restrictive immigration policies. The Other is defined before entry and tested with regard to his or her knowledge of the language, the moral and political values, the culture, and the history of the new chosen society. This comes to evaluate the capacity of the emigrant for assimilation—that is, to make boundaries invisible once one has migrated into the country. In reality, the question of Otherness has expanded from internal state borders to a transnational scale, unifying the multiplicity of Otherness abroad and transforming it into a globalized Other according to the conceptualized, categorized, and politicized codes in the country. In the European context and since September 11, 2001 in the West in general, Islam as Otherness has expanded from each society to a global perspective and is justified by the fear of Islam as a transnational force that penetrates national societies and creates a competition between cultural religious communities expanded beyond the borders of the national secular community (Kastoryano 2007).

Is Islam like Spanish? Is language like religion? The international dimension of ethnoreligious identification has been analyzed by Herbert Gans as a component of what he calls “symbolic ethnicity,” defined as an ethnicity of last resort (1979). In contemporary politics, such ethnic identification is expressed through transnational preoccupations, either concerning the country of origin, or more broadly an “imagined transnational community” elaborated around a common identity of postcolonial migrants in Europe—that is, Islam. The recognition of language does not lead to an institutional representation like religion, even though the recognition of linguistic pluralism—with regard to regional languages and not the one maintained by immigrants—is a part of minority rights as a process of Europeanization. But religion, according to Steven Vertovec, is better adapted to the problem of transnationalism than other forms of identity. A transnational community founded on religion is in essence a multiethnic community in terms of nationality and language (Vertovec 2002). Religion nonetheless provides a common identity for the non-European minority in Europe. Moreover, religious communities have always been stimulated by secularization to organize themselves into pressure groups and to take action in the domain of international relations, as demonstrated in treaties governing minorities from the 1648 Treaty of Westphalia to the 1878 Berlin Conference and the League of Nations after World War I (Preece 1998).

The elaboration of transnational structures clearly reveals multiple references and allegiances: to the host country, to the home country, and to a constructed transnational community. Whether or not immigrants are citizens, their loyalty to the host country comes from sharing its social and political institutions. The home country, despite its cultural and ethnic heterogeneity, provides emotional support and identity resources. A transnational community, combining both host and home country ties, represents a new reference point that gives rise to the formation of a transnational identity as inspiration for political action and as an instrument for cultural and religious purposes beyond national borders.



Some of the existing immigrants' transnational networks are formal, some informal; some are based on identity, some on interest; and some are based on both identity and interest. Some arise from local initiatives in countries of immigration, while others begin in the country of origin and extend through formal or informal international organizations, such as religious ones. Islamic associations use the European space in the same way as cultural and social associations, but Muslims receive no support in the name of secularism, either by national or supranational institutions. Representatives of Islamic associations work mainly in connection with the home countries, with international organizations, or both. The home countries try to rally their nationals to achieve recognition from the European authorities and they reactivate migrants' home country loyalties through religion and contributions to the creation of a "transnational community." International organizations interested in Islam in Europe mobilize resources to allow Muslims to go beyond national diversity in the various countries of the European Union to create a single religious identification and a transnational solidarity based on this diversity. Because of this policy, international and denominational networks have fit into the European system and rival the sociocultural associations on a local level. Although these Islamic associations are fragmented from within by various home and host national identities and denominations, more and more, Islam represents a unifying identity among Muslim immigrants for asserting collective interest and structuring a transnational community which transcends the boundaries of member-states. The internal diversity to the transnational community is "recentered" around demands for Islam's representation and recognition within the institutional framework of the European Union. The objective is to promote a common identification: to be Muslim in Europe, even though the political identity of Muslims has been shaped and developed primarily according to their specific relations with each state, and in each society the international agenda for Muslims is expressed through transnational networks throughout Europe and beyond. Their scope is broad and expansive with regard to nationality, to regional identity, and even to denomina-

tions. Sometimes their agenda calls for a collective identification with the Muslim world in general.

From the European states' perspective, despite the retreat of liberal democracies from multiculturalism, the principle and the discourse is now diffused on an international and supranational level within European institutions and beyond. The question is associated with minority rights, more specifically with national minorities and indigenous populations; it does not concern immigrants and nonterritorial ethnic groups even though some of the transnational networks have been initiated by European supranational institutions, such as the European Parliament or the European Commission. The principle is interpreted as the extension of human rights (Kymlicka 2007). In 1966, Article 27 of the UN charter stipulates that "in those states in which ethnic, religious and linguistic minorities exist, persons belonging to such minorities shall not be denied the right, in community with other members of their group, to enjoy their own culture, to profess and practise their own religion, or to use their own language" (Guiraudon 2009: 131-158).

Cultural, ethnic, and religious communities recognized as such by states increasingly draw support from transnational solidarities and are guided mainly by a deterritorialized, unbounded, and imagined geography. Competition between states and communities in the realm of identity and citizens' loyalty thus has spread to the international scene and has led states to extend their actions, as transnational communities have, beyond their territories to deploy their sovereignty by imposing integration policies beyond their territorial boundaries through, for example, restrictive immigration policies. At the same time, the extension of state power as it is practiced in relation to transnational communities causes new power struggles to emerge between states and communities. Groups draw their power from their mobility, their capacity to switch from one network of influence to the other, and the normativity of international and supranational institutions (NGOs and European institutions) to exert pressure on states. States react in order to maintain control over populations on the move, not only within a specific territorial space but also across borders.

## NOTES

1. This title is the translation of a book that I edited in French. This article is a version of that introduction (see Kastoryano 2005: 13-39).
2. The “zones” are areas where 28.9 percent of the students are children of foreigners, as opposed to 10.8 percent on the national level. See Boulot et al. (1988).

## REFERENCES

- Bader, Veit. “Dutch Nightmare? The End of Multiculturalism.” *Canadian Diversity* 4:1 (2005): 9-12.
- Balibar, Etienne and Immanuel Wallerstein. *Race, Nation, Classe: Les Identités Ambiguës*. Paris: Éditions la Découverte, 1988.
- Baudrillard, Jean, and Marc M. Guillaume. *Figures d’Altérité*. Paris: Descartes, 1994.
- Becker Howard. *Outsiders: A Study of the Sociology of Deviance*. New York: Free Press, 1963.
- Boulot, Serge, and Danielle Boyzon-Fradet. *Les Immigrés et l’Ecole: une Course d’Obstacles Lectures et Chiffres 1973-1987*. Paris: L’Harmattan, 1988.
- Caillé, Alain. “Présentation: De la Reconnaissance: Don, Identité, et Estime de Soi.” *MAUSS* 23 (Spring 2004): 5-28.
- Fraser, Nancy. “From Redistribution to Recognition.” *New Left Review* 1:212 (July- August 1995): 68-93.
- Foucault, Michel. *Les Mots et les Choses*. Paris: Gallimard, 1966.
- Fredrickson, George. “Identité nationale et Codes de l’Altérité dans l’Histoire de la France et des Etats-Unis.” *Les Codes de la Différence—Race, Origine, Religion en France en Allemagne et aux Etats-Unis*. Ed. Riva Kastoryano. Paris: Presses de Sciences Po, 2005: 43-67.
- Fukuyama, Francis. “Identity, Immigration and Liberal Democracy.” *Journal of Democracy* 17:2 (2006): 5-21.
- Gans, Herbert. “Symbolic Ethnicity: The Future of Ethnic Groups and Cultures in America.” *Ethnic and Racial Studies* 2:1 (1979): 1-21.
- Green, Nancy. *Repenser les Migrations*. Paris: PUF, 2002.

- Guiraudon, Virginie. "Multiculturalism and European Law." *An Identity for Europe: The Relevance of Multiculturalism in EU Construction*. Ed. Riva Kastoryano. New York: Palgrave Macmillan, 2009.
- Hattam, Victoria. "Ethnicity: An American Genealogy." *Not Just Black and White: Historical and Contemporary Perspectives on Immigration, Race, and Ethnicity in the United States*. Eds. Nancy Foner and George M. Fredrickson. New York: Russell Sage Foundation Publications: 2004.
- Hirshmann, Charles. "The Role of Religion in the Origins and Adaptation of Immigrant Groups in the United States." *International Migration Review* 38 (Fall 2004): 1206-1234.
- Hochschild, Jennifer L. "Looking Ahead : Racial Trends in The United States." *Daedalus* (Winter 2005): 70-81.
- Hollinger, David A. "The One Drop Rule and the One Hate Rule." *Daedalus* (Winter 2005): 18-28.
- Huntington, Samuel P. *Who Are We? The Challenges to America's National Identity*. New York: Simon and Schuster, 2004.
- Jackson Preece, J. *National Minorities and the European Nation-State System*. London: Oxford University Press, 1998.
- Joppke, Christian. "The Retreat of Multiculturalism in the Liberal State." *British Journal of Sociology* 55:2 (2004): 237-257.
- Kastoryano, Riva, ed. "Introduction." *Les Codes de la Différence: Race, Origine, Religion en France en Allemagne et aux Etats-Unis*. Paris: Presses de Sciences Po, 2005.
- Kastoryano, Riva. *Negotiating Identities: States and Immigrants in France and Germany*. Princeton: Princeton University Press, 2002.
- . "Race and Ethnicity in France." *Social Inequalities in Comparative Perspective*. Eds. F. Devine and M.C. Waters. Oxford: Blackwell, 2004: 66-88.
- . "Définir l'Autre en France, en Allemagne et aux Etats-Unis." *Les Codes de la Différence: Race, Origine, Religion en France en Allemagne et aux Etats-Unis*. Paris: Presses de Sciences Po, 2005: 11-31.
- . "Transnational Nationalism: Redefining the Nation and Territory." *Identities, Affiliations and Allegiances*. Eds. S. Benhabib and I. Shapiro. Cambridge: Cambridge University Press, 2007: 159-181.

- Koopmans, Ruud. "The Failure of Dutch Multiculturalism in Cross-National Perspective." Paper presented at the conference "Immigrant Political Incorporation," Radcliffe Institute for Advanced Study, Harvard University, April 22–23, 2005.
- Kymlicka, Will. *Multicultural Odysseys: Navigating the New International Politics of Diversity*. Oxford: Oxford University Press, 2007.
- Lamont, Michèle. *The Dignity of Men*. Cambridge: Harvard University Press, 2002.
- Lamont, Michèle, and Marcel Fournier, eds. *Cultivating Symbolic Boundaries and the Making of Inequality*. Chicago: University of Chicago Press, 1992.
- Noiriel, Gérard. "Le Creuset Français." Paris: Éditions du Seuil, 1987.
- Prévo, Hubert. "Document on Social Policies of Integration." Paper presented to the Organization for Economic Cooperation and Development, Paris, March 1991.
- Prewitt, Kenneth. "Racial Classification in America: Where Do We Go From There?" *Daedalus* (Winter 2005): 11.
- Rosanvalon, Pierre. *La Nouvelle Question Sociale*. Paris: Éditions du Seuil, 1996.
- "Sans Distinction de ... Race." *Mots/Langage du Politique*. Special Issue. (December 1992).
- Schain, Martin. *The Politics of Immigration in France, Britain and the United States*. New York: Pelgrave, 2008.
- Schuck, Peter. *Diversity in America. Keeping Government at a Safe Distance*. Cambridge: Harvard University Press, 2003.
- Silberman, Roxane. "French Immigration Statistics." *Immigrants in Two Democracies: French and American Experience*. Eds. D. L. Horowitz and G. Noiriel. New York: New York University Press, 1992.
- Simmel, Georg. "The Stranger." *Georg Simmel on Individuality and Social Forms*. Chicago: University of Chicago Press, 1971 (1908).
- Simon, Patrick. "Sciences Sociales et Racismes: Où Sont les Docteurs Folamour?" *Mouvements* 3 (Mars-Avril 1999): 111-115.
- Taylor, Charles. *The Politics of Recognition*. Princeton: Princeton University Press, 1992.

- Tietze, Nikola. "La Politique de la Langue: Entre Intégration et Reconnaissance de la Différence." *Les Codes de la Différence. Race, Origine, Religion en France en Allemagne et aux Etats-Unis*. Ed. Riva Kastoryano. Paris: Presses de Sciences Po, 2005.
- Todorov, Tzevan. *Nous et les Autres. La Pensée Politique Française sur la Diversité Humaine*. Paris: Ed. Seuil, 1988.
- Vertovec, Steven. "Religion in Migration, Diasporas and Transnationalism." Working Paper Series, no. 02-07, Vancouver Center of Excellence, 2002.
- Zolberg, Aristide. *A Nation by Design*. Cambridge: Harvard University Press, 2006.
- Zolberg, Aristide, and Long Litt Woon. "Why Islam is like Spanish." *Politics and Society* 27:1 (March 1999): 5-38.